MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ
RICHARD F. ALBERT
ROBERT J. ANELLO*
BENJAMIN S. FISCHER
CATHERINE M. FOTI
CHRISTOPHER B. HARWOOD
LAWRENCE IASON
BRIAN A. JACOBS
TELEMACHUS P. KASULIS
JODI MISHER PEIKIN
ROBERT M. RADICK*
JONATHAN S. SACK**
EDWARD M. SPIRO
JEREMY H. TEMKIN
RICHARD D. WEINBERG

565 FIFTH AVENUE NEW YORK, NEW YORK 10017 (212) 856-9600 FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

cfoti@maglaw.com (212) 880-9530

December 4, 2020

SENIOR COUNSEL
PAUL R. GRAND
COUNSEL
JASMINE JUTEAU
CURTIS B. LEITNER
JACOB W. MERMELSTEIN
BRENT M. TUNIS
ROBERT G. MORVILLO

ROBERT G. MORVILLO
1938-2011
MICHAEL C. SILBERBERG
1940-2002
JOHN J. TIGUE, JR.

*ALSO ADMITTED IN WASHINGTON, D.C.

BY ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Jennifer Eckhart v. Fox News Network, LLC, et al., Civil Case No. 1:20-cv-05593

Dear Judge Abrams:

I am writing on behalf of Defendant Edward Henry. As the Court knows, Mr. Henry's response to Plaintiff Jennifer Eckhart's Third Amended Complaint is due on Monday. Mr. Henry is writing now to seek the Court's permission to file a memorandum of law in support of his motions totaling 42 pages in length (a seventeen-page extension from the Court's current page limit). I have consulted with Michael Willemin, counsel for the Plaintiff, and he has informed me that the Plaintiff consents to this request.

The reason for the enlargement of pages is because Mr. Henry is moving to dismiss each of the nine claims Plaintiff asserts against him. In addition, Mr. Henry intends to make a motion to strike and a motion for a more definite statement along with his motion to dismiss. Mr. Henry will be including arguments for all three motions in the same memorandum. Mr. Henry believes these reasons support a finding of good cause to grant the request for an enlargement. Accordingly, Mr. Henry respectfully requests that he be permitted to file a memorandum of 42 pages in length.

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P. C.

The Honorable Ronnie Abrams December 4, 2020 Page 2

Thank you for your consideration.

Respectfully submitted,

/s/ Catherine M. Foti

cc: All counsel of record (via ECF)